

May 17, 2002

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: In re *UNE Triennial Review*, CC Dockets 01-338, 96-98 and 98-147

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on May 16, 2002, its representatives and representatives of its member companies Access Integrated Networks, El Paso Global Networks, Illuminet, ITC^Deltacom, Talk America and Z-Tel Communications met with Commissioner Martin and Dan Gonzalez, Legal Advisor to Commissioner Martin in the above captioned proceeding.¹ A representative from M/C Venture Partners, a private equity firm with investments in CompTel members, was also present.

CompTel and its members explained the critical need for the Commission to maintain, at a minimum, the FCC's current list of UNEs. Specifically, CompTel explained the continued need for the availability of unbundled local switching as a UNE, because without such access competitors will be impaired in their ability to serve mass market customers. CompTel also explained the need for the Commission to preserve competitors' access to the ILEC dark fiber UNE. Only through the availability of dark fiber as a UNE, can competitive wholesale carriers bring additional local transport and loop capacity on the market in competition with the RBOC. Such a UNE benefits all competitive carriers, who are dependent on ILEC facilities for transport and last mile connectivity.

¹ See *In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, Notice of Proposed Rulemaking, FCC 01-361 (rel. December 20, 2001) (NPRM).

Marlene Dortch

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Representing Access Integrated Networks was Rodney Page. Representing El Paso Global Networks were Bruce Northcutt, Steve Crawford, and Pete Manias. Representing Illuminet was Jerry Easom. Representing ITC^DeltaCom was Andrew Walker. Representing Talk America was George Vinal. Representing Z-Tel Communications were Robert Curtis and Thomas Koutsky. Representing M/C Venture Partners was Peter Claudy. Representing CompTel in the meeting were H. Russell Frisby, Jr., Robert McDowell, and the undersigned attorney. Additionally, copies of the attached information about ITC^DeltaCom were distributed and briefly discussed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan D. Lee". The signature is fluid and cursive, with the first name "Jonathan" being more prominent than the last name "Lee".

Jonathan D. Lee

Vice President, Regulatory Affairs

ITC^DeltaCom, Inc. Company Profile

2001 Revenues: \$414M (\$460-470M forecast for 2002)

2001 ebitda: \$ 45M (\$70M forecast for 2002)

Business Profile: Southern-based CLEC (BellSouth overlay)

Telecom Assets Deployed: \$900M

Fiber-optic network \$500M

Voice/Data switching: \$400M

Key Business Metrics:

10,000 route mile fiber network

3,000 miles Internet backbone with 4-way diversity to Tier1

125 points-of-presence

178 ILEC collocations

60 intra-lata routes

36 branch sales/service offices

148 voice, data and next generation switches

Interconnection agreements with BellSouth, Verizon, Sprint & SBC

Bundled Product Offering: Local, LD, frame/ATM, Internet, CPE

Local Switching Strategy: Hub & Spoke (primary to 2nd & 3rd tier mkts)

16,000 Customers @ \$1300/mo average

Retail Lines Installed: 150,000 (does not include 140,000 ISP lines)

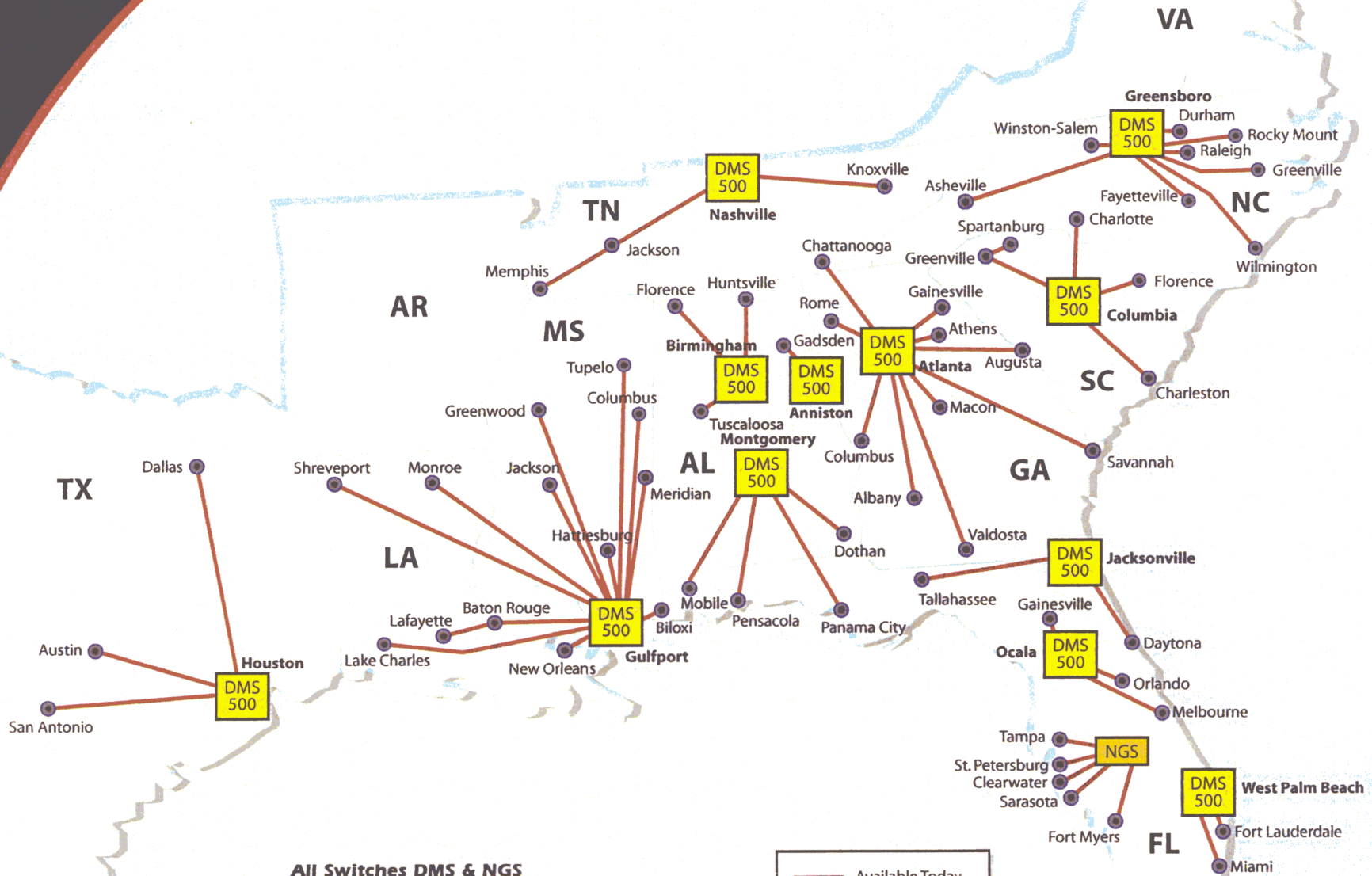
Local Serving Strategy: ILEC last mile

2-7 line customers: UNE-P, UNE, TSR

8+ line customers: UNE-T, DS-3, fiber

Last Mile Alternatives to ILEC: virtually none

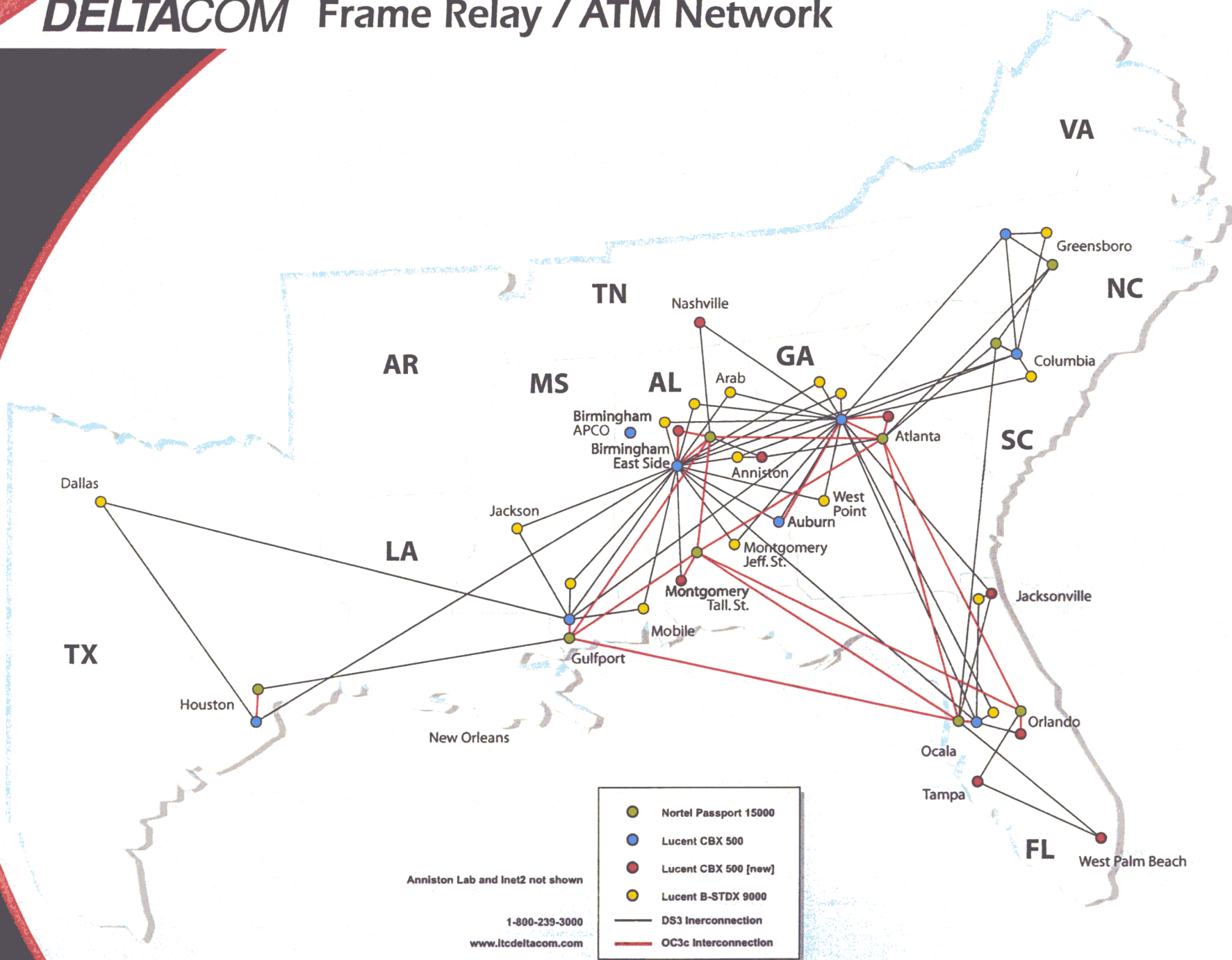


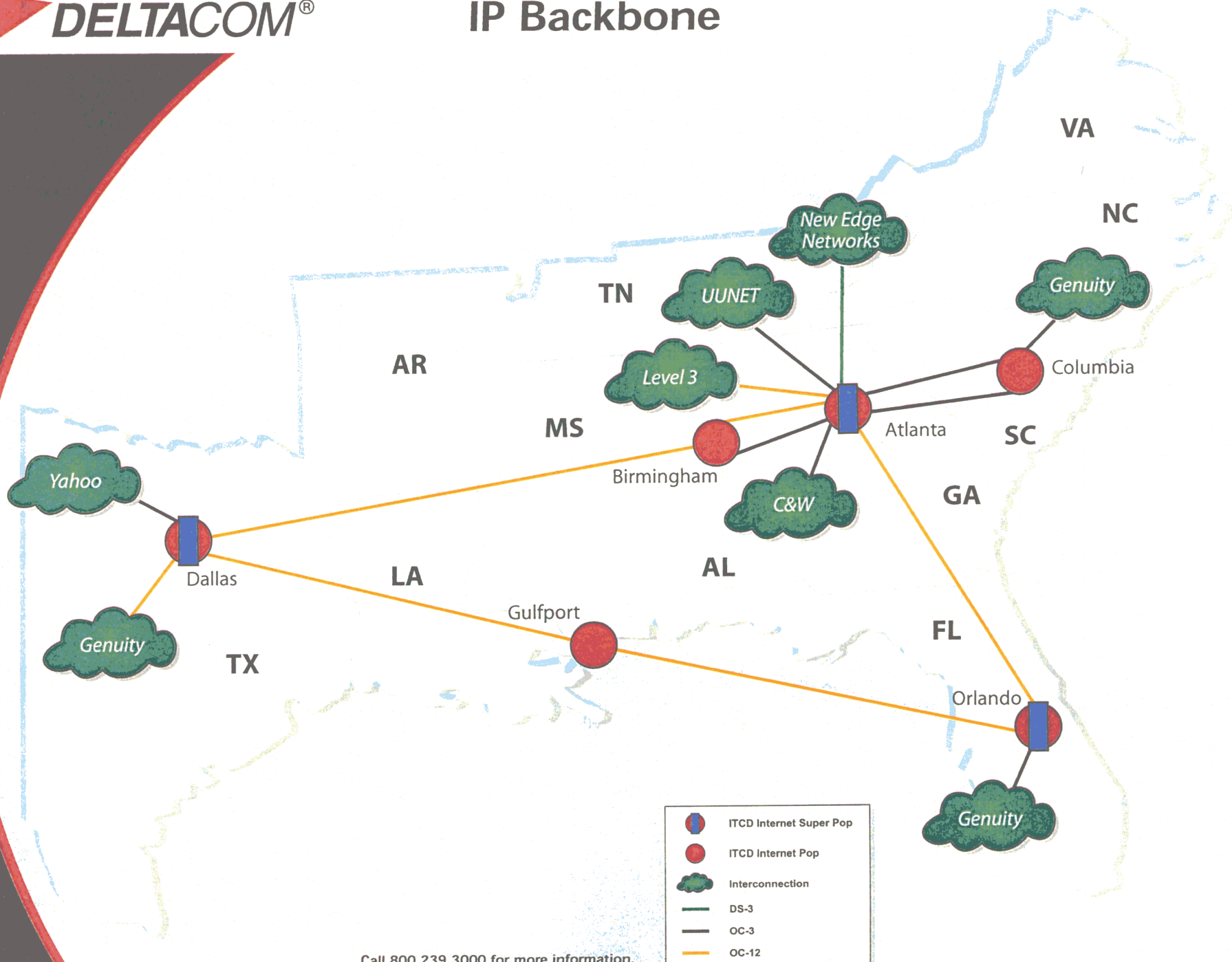


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